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Attorneys for Defendant, Counter-Claimant, and Cross-Complainant First Advantage Litigation Consulting, LLC

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TUDOR INSURANCE COMPANY,

Plaintiff,

VS.

FIRST ADVANTAGE LITIGATION CONSULTING, LLC,

Defendant

FIRST ADVANTAGE LITIGATION CONSULTING, LLC,

Counter-Claimant and Cross-Complainant,

VS.

AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, FEDERAL INSURANCE COMPANY, TUDOR INSURANCE COMPANY, and ZURICH AMERICAN INSURANCE COMPANY,

Counter-Claim Defendants

Case No. 11CV3567 (LAK) (Electronically Filed)

DECLARATION OF BRET T. JARDINE IN SUPPORT OF DEFENDANT, COUNTER-CLAIMANT, AND CROSS-COMPLAINANT FIRST ADVANTAGE LITIGATION CONSULTING, LLC'S MOTION TO DISMISS, STAY, OR TRANSFER

- I, Bret T. Jardine, do declare:
- I am General Counsel to First Advantage Corporation, located at 100 Carillon Parkway, St. Petersburg, Florida 33716.
- I make this declaration in support of First Advantage Litigation
 Consulting, LLC's Motion to Dismiss, Transfer, or Stay this action. Unless indicated
 herein to the contrary, I have first-hand knowledge of the matters recited herein.
- 3. There are several "First Advantage" entities all affiliates to each other with various business lines.
- 4. STG-Fairway Holdings, Inc., d/b/a First Advantage Corporation is a holding company that is headquartered in St. Petersburg, Florida and incorporated in Delaware. First Advantage has additional offices in Canada, Oklahoma, Massachusetts, Indiana, Texas, Arizona, United Kingdom, Singapore, Hong Kong, Australia, Philippines, India, China, Japan, Malaysia, and South Korea.
- Backtrack Reports, Inc. was a subsidiary of First Advantage
 Corporation. It was later consolidated and merged into First Advantage Litigation
 Consulting LLC also a wholly owned subsidiary of First Advantage.
- 6. First Advantage Litigation Consulting LLC is a Virginia limited liability company that has offices in Bangalore, Brussels, Hong Kong, London, Los Angeles, Munich, New York, Tokyo, and Washington, D.C.
- 7. Documents relevant to this insurance coverage action are located in Florida.

- 8. The key management officials for the First Advantage companies work out of Florida.
- 9. The offices in New York form a small part of the First Advantage companies' overall operations.

Executed under penalty of perjury under the laws of the United States of America in St. Petersburg, Florida on August 12, 2011.

Bret T. Jardine